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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ANDREA RIDGELL, on behalf of
herself and others similarly situated
Plaintiff,

v.

FRONTIER AIRLINES, INC. a
Colorado corporation; AIRBUS S.A.S.,
a foreign corporation doing business in
the State of California; AIRBUS
GROUP HQ INC., a corporation doing
business in the State of California
Defendants.

**CASE NO. CV 18-4916 PA (AFMx)
DECLARATION OF KILEY LYNN
GROMBACHER IN SUPPORT OF
RESPONSE TO PLAINTIFF TO
ORDER TO SHOW CAUSE RE:
DISMISSAL FOR LACK OF
PROSECUTION**

DECLARATION OF KILEY L. GROMBACHER

I, Kiley Lynn Grombacher, declare as follows:

1. I am an attorney duly admitted to practice law before this Court and I am a member in good standing of the State Bar of California, the State Bar of Tennessee, and in the Third and Ninth Circuits.

2. I am a named partner at Bradley/Grombacher, LLP counsel for Andrea Ridgell ("Plaintiff").

3. In my capacity as counsel, I have been actively involved with all aspects of this litigation. Accordingly, I have personal knowledge of all the matters set forth herein, and if called, I could and would competently testify to the following:

4. I submit this declaration in support of the Response of Plaintiff to the Order to Show Cause Re: Dismissal for Lack of Prosecution.

5. Plaintiff filed this action on June 1, 2018.

6. Given that defendant Airbus S.A.S. ("Airbus") is a foreign corporation, service must be effectuated through protocols established by the Hauge Convention.

7. Shortly after filing, Plaintiff caused the complaint and all initiating documents to be translated into French.

8. Promptly upon translation, Plaintiff began the process of effectuating service under the Hague Convention with the assistance of ABC Legal Services, Inc. ("ABC Legal"), a process serving company.

9. On or about July 12, 2018, ABC Legal caused a service request along with French translations of the following case-related documents to be transmitted via Federal Express to the Ministry de la Justice in Paris: Complaint, Summons, Notice of Assignment, Standing Order, Notice to Parties of Court-Directed ADR, and Certificate of Interested Parties.

